## IN THE UNITED STATES DISTRICT COURT

#### FOR THE DISTRICT OF DELAWARE

WILLIAM and MAUREEN ANELLO,	)	
Plaintiffs,	)	
v.	)	C.A. No. 07-668 GMS
INDIAN RIVER SCHOOL DISTRICT and SUSAN S. BUNTING,	)	
Defendants.	)	

### **DEFENDANTS' INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and Local Rule 16.2, Defendants Indian River School District and Dr. Susan S. Bunting (the "Defendants"), through their attorneys, submit their Initial Disclosures. Further discovery, investigation, and research may produce additional relevant facts that may lead to changes in the disclosures set forth below. These disclosures are complete to the best of the Defendants' knowledge. Accordingly, the Defendants reserve the right to amend, supplement or modify these disclosures as required by Rule 26(e) of the Federal Rules of Civil Procedure.

# A. Individuals Likely To Have Discoverable Information That The Defendants May Use To Support Their Defenses

At present the Defendants have identified the following persons, in addition to representatives of the Plaintiff, as being reasonably likely to have discoverable information the Defendants may use to support their defenses in this matter. The following persons may be contacted only through the Defendants counsel of record:

The individuals who testified at the Due Process hearings in this matter.

# B. Description of Documents That Defendants May Use To Support Their Defenses

At present, the Defendants identify the following categories of documents and tangible things in their possession, custody or control that they may use to support their defenses:

Evidence entered at the Due Process hearings in this matter.

## C. Computation of Damages

The Defendants have not claimed any damages in this matter. However, the Defendants reserve the right to seek attorney's fees and costs, and any other relief the Court deems appropriate, should they prevail in this action.

## D. Insurance Coverage

This claim is not covered by the Defendants insurance policies.

**MORRIS JAMES LLP** 

David H. Williams (#616) dwilliams@morrisjames.com James H. McMackin, III (#4284) jmcmackin@morrisjames.com 500 Delaware Avenue, Suite 1500 Wilmington, DE 19899 Attorneys for the Defendants

Dated: June 5, 2008

## IN THE UNITED STATES DISTRICT COURT

### FOR THE DISTRICT OF DELAWARE

WILLIAM and MAUREEN ANELLO,	)
Plaintiffs,	)
v.	) C.A. No. 07-668 GMS
INDIAN RIVER SCHOOL DISTRICT and SUSAN S. BUNTING,	)
Defendants.	)

### CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on June 5, 2008, I electronically filed the attached **DEFENDANTS' INITIAL DISCLOSURES** with the Clerk of Court using CM/ECF, and that I have mailed by United States Postal Service the document to the following non-registered participant:

William Anello 362 Alba Court West Grove, PA 19390

Maureen Anello 362 Alba Court West Grove, PA 19390

> David H. Williams (#616) dwilliams@morrisjames.com James H. McMackin, III (#4284) jmcmackin@morrisjames.com MORRIS JAMES LLP 500 Delaware Avenue, Suite 1500 P.O. Box 2306

Wilmington, DE 19899 (302) 888-6900/5849 Attorneys for Defendants

JYM/112152-0001/1816535/1